# IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE:	) Chapter 11	
	)	
IYS VENTURES LLC,	) Case No. 23-067	182
	)	
	) Hon. David D. C	leary

### AMENDED NOTICE OF MOTION

TO: Attached Service List

PLEASE TAKE NOTICE THAT on January 31, 2024, at 10:00 a.m., I shall appear before the Honorable Judge David D. Cleary, or any other judge sitting in his stead, either in Courtroom 644, 219 South Dearborn Street, Chicago, Illinois, or electronically as described below and request a hearing on the Debtor's Amended Motion To Set Hearing on the Approval of the Adequacy of the Disclosure Statement, a copy of which is attached hereto and thereby served upon you.

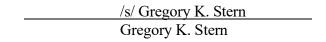
Important: Only parties and their counsel may appear for presentation of the motion electronically using Zoom for Government. All others must appear in person.

**To appear by Zoom using the internet**, use this link: http://www.zoomgov.com/. Then enter the meeting ID and password.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is Meeting ID: 161 122 6457 and the password is Cleary644. The meeting ID and password can also be found on the judge's page on the court's website.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, these motions will be called on the presentment date. If no Notice of Objection is timely filed, the Court may grant the motions in advance without a hearing.



Gregory K. Stern (Atty. ID #6183380) Dennis E. Quaid (Atty. ID #02267012) Monica C. O'Brien (Atty. ID #6216626) Rachel S. Sandler (Atty. ID #6310248) 53 West Jackson Boulevard, Suite 1442 Chicago, Illinois 60604 / (312) 427-1558

### **CERTIFICATE OF SERVICE**

I, the undersigned, an attorney, hereby certify that pursuant to Section II, B, 4 of the Administrative Procedures for the Case Management/Electronic Case Filing System, I caused a copy of the foregoing NOTICE OF MOTION and AMENDED MOTION to be served on all persons set forth on the attached Service List identified as Registrants through the Court's Electronic Notice for Registrants and, as to all other persons on the attached Service List by mailing a copy of same in an envelope properly addressed and with postage fully prepaid and by depositing same in the U.S. Mail, Chicago, Illinois, on the 26<sup>th</sup> day of January 2024.

/s/ Gregory K. Stern
Gregory K. Stern

Gregory K. Stern (Atty. ID #6183380) Dennis E. Quaid (Atty. ID #02267012) Monica C. O'Brien (Atty. ID #6216626) Rachel S. Sandler (Atty. ID #6310248) 53 West Jackson Boulevard Suite 1442 Chicago, Illinois 60604 (312) 427-1558

### **SERVICE LIST**

## Registrants Served Through The Court's Electronic Notice For Registrants

Patrick Layng, United States Trustee 219 South Dearborn Street, Suite 873 Chicago, Illinois 60604

William J. Serritella/Yeoeun C. Yoon/Kimberly Ross Clayson/Jillian S. Cole 111 East Wacker Drive, #2600 Chicago, Illinois 60601

Miriam Stein Granek 4711 Golf Road, #200 Skokie, Illinois 60076

Gordon E. Gouveia/Peter C. Buckley/Matthew Higgins 321 North Clark Street, Suite 1600 Chicago, Illinois 60654

William K. Kane/Robert McLellard 321 North Clark Street, 32nd Floor Chicago, Illinois 60654

Ariel Weissberg 125 South Wacker Drive, Suite 300 Chicago, IL 60606

John Morgan 2777 Summer St. Stamford, CT 06805

Cari Kauffman 180 North LaSalle Street, Suite 2700 Chicago, Illinois 60601

James Philbrick P.O. Box 351 Mundelein, Illinois 60060

John Reding 100 West Randolph Street, 13<sup>th</sup> Floor Chicago, Illinois 60601

Joseph D. Frank 1327 West Washington Boulevard, Suite 5 G-H Chicago, Illinois 60607 Kevin Kobbe DLA Piper 650 S. Exeter Street, Suite 1100 Baltimore, MD 21202

## Parties Served Via United States Mail

IYS Ventures, LLC 15416 South 70th Court Orland Park, Illinois 60462

Aramark Uniform Services 2334 South Michigan Avenue Chicago, IL 60616

BMW Financial Services/Customer Service Center PO Box 3608 Dublin, OH 43016-0306

Byzfunder NY LLC 530 7th Avenue, Suite 505 New York, NY 10018

Coca-Cola Bottling Company PO Box 105637 Atlanta, GA 30348

Fox Capital Group, Inc. 803 South 21st Avenue Hollywood, Florida 33020

Home State Security 250 East 5th Street, 15 Floor Cincinnati, OH 45202

Manistique Oil Company 216 Deer Street Manistique, MI 49854

Red Bull Distribution Company PO Box 204750 Dallas, TX 75320

Samson Funding 17 State Street, Suite 630 New York, New York 10004 U.S. Small Business Administration 409 3rd Street SW Washington, DC 20416

We Energies PO Box 2046 Milwaukee, WI 53201-2046

Wisconsin Department of Revenue 2135 Rimrock Road Madison, WI 53713

Xcel Energy PO Box 9477 Minneapolis, MN 55484-9477

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE		)	Chapter 11
		)	
IYS VENTURES LLC		)	Case No. 23-06782
		)	
	Debtor.	)	Hon. David D. Cleary

# AMENDED MOTION TO SET HEARING ON THE APPROVAL OF THE ADEQUACY OF THE DISCLOSURE STATEMNET

NOW COMES IYS Ventures LLC, Debtor and Debtor in Possession, by and through its attorneys, Gregory K. Stern, Monica C. O'Brien, Rachel S. Sandler and Dennis E. Quaid, and in support of its Amended Motion To Set Hearing on the Approval of the Adequacy of the Disclosure Statement, states as follows:

- 1. On May 23, 2023, IYS Ventures, LLC (the "Debtor") filed a Voluntary Petition for relief under Chapter 11 of the Bankruptcy Code commencing the instant case.
- 2. On January 12, 2024, the Debtor filed its Plan of Reorganization (the "Plan") and its Disclosure Statement (the "Disclosure Statement") with the Court.
- 3. There are no pending status dates or hearing dates set for the Plan and Disclosure Statement.
- 4. By this Motion, pursuant to Bankruptcy Rule 3017(a), the Debtor requests this Court set a hearing on February 21, 2024, to consider the adequacy of the Disclosure Statement in accordance with 11 U.S.C. §1125(d); and, set February 14, 2024, as the last day to file objections to the Disclosure Statement.
- 5. On January 24, 2024, a copy of the Plan and Disclosure Statement and Notice of Hearing on the Adequacy of the Disclosure Statement was transmitted to the Debtor, the United States Trustee, the 20 largest unsecured creditors and all creditors requesting notice through the CM/ECF

system.

6. As there are certain deadlines set in this case, with regards to the required notice for

the hearing on the adequacy of the disclosure statement required pursuant to Bankruptcy Rules

2002(b) and 3017(a), the Debtor requests that such notice be limited to that provided in Paragraph 5,

above; or, alternatively, that the twenty-eight day notice requirement to all creditors be shortened to

twenty one days, so that the hearing on the adequacy of the disclosure can he held on February 21,

2024.

WHEREFORE, the Debtor requests the Court (1) set a hearing on the adequacy of the

Disclosure Statement for February 21, 2024, at 10:30 a.m.; (2) set February 14, 2024, as the last day

to file and serve an objection to the Disclosure Statement; (3) limit and/or shorten the notice required

for the hearing on the adequacy of the disclosure statement pursuant to Bankruptcy Rules 2002(b)

and 3017(a); and, (4) for such other further relief as the Court deems just.

By: /s/ Gregory K. Stern

Gregory K. Stern, Attorney for Debtor

Gregory K. Stern (Atty. ID #6183380)

Monica C. O'Brien (Atty. ID #6216626)

Dennis E. Quaid (Atty. ID #02267012)

Rachel S. Sandler (Atty. ID #6310248)

53 West Jackson Boulevard

**Suite 1442** 

Chicago, Illinois 60604

(312) 427-1558